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Combined Sewer Final Overflows—Guidance for Financial Capability Assessment and Schedule Development

- Other viable funding mechanisms and sources of financing.

These factors may warrant phasing the CSO control implementation schedules in a manner other than would be prescribed by logical engineering sequencing and normal construction practices. This section illustrates how these considerations may affect scheduling and provides some general scheduling boundaries to aid all parties in negotiating the final implementation schedule for CSO controls.

Scheduling is first considered during the permittee's development of an LTCP. The LTCP should assess CSO control alternatives including estimated design and construction time requirements for various components of the CSO controls. In general, CSO controls should be implemented as expeditiously as possible.

The permittee should first develop a tentative implementation schedule based on logical engineering sequencing and normal construction practices. The permittee should complete a critical path analysis to identify the shortest implementation schedule that will achieve the control objectives identified in the LTCP (See guidance: *Combined Sewer Overflows-Guidance for Long-term Control Plan (EPA 832-13-95-002)*). As a result of negotiations with state NPDES and EPA authorities, it may be appropriate to modify the tentative design and construction schedule based on the environmental and financial considerations listed above.

In general, the final negotiated schedule for CSO controls would reflect two types of modifications to the engineering and construction schedule. First, where CSOs discharge to sensitive or significantly use-impaired water bodies, the final schedule would provide for expedited implementation of the controls for these discharges. Second, the schedules may be phased or extended to reflect the significance of various financial considerations, particularly financial capability. The number of years to implement the CSO controls would be negotiated between the permittee, EPA and state NPDES authorities.

The following discussion provides more information on environmental and financial considerations that affect implementation schedules for CSO controls.